

2021 iPCB/TSCA Project Proposals

Reminder that all project proposals must include some nexus between iPCBs/TSCA and the Spokane River

1. Technical Considerations:

- a. **Reduce iPCBs in Commerce** - work collaboratively with pigment/ink/paint industries/trade groups to develop strategies for moving towards lower PCB containing pigment/ink/paint products (i.e.: move back towards PY #1, change pigment use in products that don't need durability such as newsprint, develop lower PCB containing products such as road paint example, etc.).

- b. **Evaluate fate of PCB-11** (i.e.: in water, in fish, in humans, etc.)

Commented [DK1]: not sure what else we can be doing here beyond what SRRITF is already doing with water column and fish sampling, PMF analysis, etc. Need help in trying to identify particular projects, and also not sure how the outcome can benefit since all PCBs are regulated in total.

2. Market Drivers:

- a. **Lower Procurement Limits Campaign** (i.e.: 0.1ppm Apple & HP) – develop an education/outreach strategy to encourage known large-scale users of iPCB products/manufacturers/National Brands (packaging, publishers, paint manufacturers/distributors, etc.) to implement enforceable policies lowering iPCB levels in products that they both use and produce. Use the Apple and HP policies as driving force examples.

Step #1 - investigate specific requirements, effectiveness, limitations, and compliance determination with lower procurement limits (i.e. 0.1 ppm Apple & HP). There needs to be a complete understanding if the procurement limits are aspirational or something that has been achieved in practice and how they are being enforced. It would be important to establish if third party or other testing being conducted to ensure conformance. Perhaps another Gonzaga R & D project?

- b. **Education/Outreach National Campaign:** consultations to inform known large-scale users of iPCB products/manufacturers/National Brands of iPCB consequences
 - i. Educate supply chain
 - ii. Set Attainable Goals for Industry (Market Driven)
 - iii. Reduction in Packaging and Graphic Printing
 - iv. Change in market demand for color
 - v. Increase Public Awareness (Create Consumer Pressure)
 - vi. Environmental Incentives resulting in “de-selection”
 - vii. Media Opportunities
 - viii. Social media outreach by large corporations to brand themselves “sustainable” target circular economy

Commented [DK2]: Suggest a coordinated effort with Education/Outreach Workgroup

3. Government/Regulatory:

- a. **Require Certification of Products and/or Pigments**
- b. **Enforcement** – petition EPA to enforce both domestic & foreign concentrations of PCBs in products under TSCA (i.e.: pigments)
- c. **Alternative WQS** - develop a national strategy with relevant trade organizations to petition EPA to review its current regulatory framework for establishing alternative water

Commented [DK3]: I consolidated all of the market driven proposals under this campaign. I suggest that we further consolidate this list into something consistent and manageable.

Commented [DK4]: Whoever suggested this needs to expound upon what is intended here and how this might be defined as a potential project for this workgroup.

Commented [DK5]: This one may not be quite ripe based on lack of data/information.

quality standards for PCBs that do not appreciably bioaccumulate. Factors to be considered are the current global regulatory framework for inadvertent PCBs, BACT principles, and toxicity of the individual classes of PCB congeners.

- d. **TSCA Cost/Benefit** - petition EPA to perform Cost/Benefit Analysis and reevaluate TSCA to support regulatory change
- e. **Permit Offset for iPCBs** - provide NPDES permit offsets or exclusions for inadvertent PCBs (i.e.: similar to intake credit)
- f. **Streamline approval/cost for new chemical products**

Commented [DK6]: Not sure if this is a viable regulatory vehicle for toxics such as PCBs.

Commented [DK7]: This is a function of TSCA, no new formulations, and beyond the scope and capability of SRRITF

4. Gary Jones (PRINTING United Alliance) Potential Projects for Consideration:

- i. Continue testing water in the Spokane River and expanded it to address the data gaps regarding unknown sources of legacy PCBs and sources of inadvertent PCB's. The Task Force needs to understand all sources of the PCB load to the river and the contribution of each source in weight and volume.
- ii. Conduct a review of the significant differences in test results between various government entities and industry to understand the basis for the differences in the methodologies for measuring results so that corrective actions can be developed to reduce or eliminate the inconsistencies.
- iii. Review and revise the current understanding of the sources and magnitude of inadvertent PCB's, especially in light of the information presented at the workshop that indicated PCB-11 has several other pathways other than certain pigments that could allow it to be deposited into water bodies. Alternative pathways may exist for the other inadvertent PCBs and those need to be better understood.
- iv. Explore how Washington State government can open a dialog with EPA to review its current regulatory framework for establishing alternative water quality standards for PCBs that do not appreciably bioaccumulate. Factors to be considered are the current global regulatory framework for inadvertent PCBs, BACT principles, and toxicity of the individual classes of PCB congeners.
- v. Explore how Washington State can adopt EPA's recently promulgated water quality standards.
- vi. Develop a white paper on the impact of EPA increasing the water quality standard for PCBs.
- vii. Investigate specific requirements, effectiveness, limitations, and compliance determination with Lower Procurement Limits (i.e. 0.1 ppm Apple & HP). There needs to be a complete understanding if the procurement limits are aspirational or something that has been achieved in practice and how they are being enforced. It would be important to establish if third party or other testing being conducted to ensure conformance.
- viii. Evaluate fate and toxicity of PCB-11 (i.e.: in water, in fish, in humans, etc.)

Commented [DK8]: This is already being done by the SRRITF through regular testing, additional studies of potential hot spots (Kaiser GW, Mead contamination, biofilm around Gonzaga, etc.), PMF analysis of existing data, etc.

Commented [DK9]: Not exactly sure what "inconsistencies" are being referenced here. However, the SRRITF is doing its best to reduce inconsistencies by following a common QAPP and using the same laboratory for analysis. This also is not a IPCB/TSCA focused effort.

Commented [DK10]: Included in the project proposals above, albeit not quite sure how this manifests into specific projects. The SRRITF is currently funding a PMF analysis which may shed more light.

Commented [DK11]: Excellent suggestion and included in the project proposals above. However, this needs to be a nationally lead effort and may be best served through collaboration with trade organizations.

Commented [DK12]: Already done.

Commented [DK13]: Outside the scope of the IPCB/TSCA workgroup. Perhaps relevant trade organizations (pigment/inks/paints/others) would consider taking this on?

Commented [DK14]: Excellent suggestion and is included with the project proposals above. This would be a good first step prior to initiating any marketing strategy.

Commented [DK15]: Tied into item #iii. above. Also being done through the NTP study and forthcoming PMF analysis. We already know from existing SRRITF data that PCB-11 is not appreciably bioaccumulating in fish.